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Civil Engineering

**ENVIRONMENTAL COMPLIANCE
ASSESSMENT AND MANAGEMENT
PROGRAM (ECAMP)**

COMPLIANCE WITH THIS PUBLICATION IS MANDATORY

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This instruction implements AFDP 32-70, *Environmental Quality*, by providing guidance for establishing an environmental management program designed to ensure compliance with Federal, state, and local environmental laws and regulations, as well as Department of Defense (DoD), and Air Force policies and instructions, through the use of comprehensive environmental compliance assessments and management action plans. MAJCOM policy may permit assessing compliance with occupational safety and health laws and regulations concurrent with an ECAMP assessment. This program is an element of the Air Force Environmental Management System (EMS). This instruction applies to personnel at all active and reserve Air Force components worldwide, and at all government-owned, contractor-operated (GOCO) facilities. The Air National Guard Readiness Center/Civil Engineering (ANGRC/CE) may set specific policies in accordance with this instruction that serve the needs of the ANG and the State Adjutants General.

SUMMARY OF REVISIONS

This document is substantially revised and must be completely reviewed.

This is a revised publication of AFI 32-7045, revising AFI 32-7045, dated 5 April 1994. This publication incorporates the concepts of the ISO 14001 Environmental Management System (EMS) throughout the application of the ECAMP; expands HQ AFCEE responsibilities to include analysis of ECAMP data and development of Enforcement Vulnerability Analysis (EVA); establishes AF legal and medical responsibilities under ECAMP; adds the Environmental Management Self-Assessment Tool (EMSAT) as a tool for ECAMP and EPC use; establishes a "Best Practices" program to crossfeed positive findings; revises ECAMP administration to eliminate references to WIMS and expands policy on public release; adds, deletes, and revises various acronyms and terms to reflect updated policy; revises ECAMP report format instructions to incorporate by reference charts and tables in the TEAM guide; combines finding category codes (FCC) and violation type codes (VTC) into a single finding identification code (FIC); and adds a complete list of root cause codes and a listing of ECAMP core data requirements.

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Chapter 1

HOW TO USE THIS INSTRUCTION

1.1. Background. In response to Executive Order 12088, *Federal Compliance and Pollution Control Standards* (October 13, 1978), the Air Force designed the Environmental Compliance Assessment and Management Program (ECAMP) to assist Air Force installations and organizations in complying with all applicable pollution control standards. This instruction complies with DoD Instructions 4715.6, *Environmental Compliance* (24 April 1996) and 4715.3, *Environmental Conservation Program* (3 May 1996).

1.1.1. Scope of ECAMP. ECAMP programs will include all major and minor installations (including tenant organizations on and off the installation), support sites with one or more permits from environmental regulatory agencies (Federal, state, local, DoD, or Air Force), and GOCO facilities. Major installations will conduct internal compliance assessments at least annually, and external compliance assessments at least once every three years. During the year in which an external compliance assessment occurs, installations are not required to conduct an internal compliance assessment. Major commands (MAJCOMs) shall determine and publicize the frequency of compliance assessments for minor and other installations.

1.1.2. Facility Exclusion/Exemption. The MAJCOM may determine that no significant environmental activity takes place on an installation or a specific support site and thus choose to exclude these sites from the program. MAJCOMs must develop and maintain a list of such excluded sites containing a description of the activities that take place on those sites, and a brief rationale for each exclusion. The MAJCOM will review this list annually for accuracy. Sites may also be exempted from the ECAMP if inclusion would significantly interfere with military effectiveness or if it is determined to be in the best national interest. The MAJCOM commander is the approval authority for either exemption.

1.2. Concept. ECAMP is one of the processes to help commanders assess the status of their Environmental Management Systems (EMSs), and to identify and track solutions to environmental problems. MAJCOMs provide additional implementing guidance in a supplemental publications to this instruction.

1.2.1. Primary Objectives. The primary objectives of ECAMP are to:

- 1.2.1.1. Improve Air Force environmental management worldwide to meet compliance standards.
- 1.2.1.2. Build supporting financial programs and budgets for funding environmental requirements.

1.2.2. Secondary Objectives. The secondary objectives of ECAMP are to:

- 1.2.2.1. Eliminate underlying environmental problems through root cause analysis.
- 1.2.2.2. Identify systemic environmental problems.
- 1.2.2.3. Forecast future compliance requirements.
- 1.2.2.4. Evaluate the effectiveness of internal environmental management programs through Environmental Management Self-Assessment.
- 1.2.2.5. Accommodate the common interests in assessing environment, safety, and occupational health programs.

1.3. Responsibilities:

1.3.1. Headquarters United States Air Force (HQ USAF):

1.3.1.1. The Office of The Civil Engineer (HQ USAF/ILE):

- 1.3.1.1.1. Provide Air Force policy regarding ECAMP.
- 1.3.1.1.2. Approve updates of the ECAMP assessment protocols and ECAMP activities.
- 1.3.1.1.3. Receive annual MAJCOM metrics and status reports to validate conformance with ECAMP objectives.

1.3.2. Field Operating Agencies (FOAs):

1.3.2.1. Air Force Center for Environmental Excellence (HQ AFCEE/EQ):

- 1.3.2.1.1. Coordinate the development and updating of ECAMP assessment protocols and publications.
- 1.3.2.1.2. Schedule and host the ECAMP workshop annually, if needed, to review MAJCOM programs, discuss current issues, and establish a vehicle to communicate successes and lessons learned.
- 1.3.2.1.3. Assist MAJCOMs on external ECAMP assessments, when requested.
- 1.3.2.1.4. Develop and update the Environmental Management Self-Assessment Tool (EMSAT) guidebook as part of the ECAMP process.
- 1.3.2.1.5. Collect positive findings that are best practices and crossfeed to other MAJCOMs, FOAs, and DoD agencies.
- 1.3.2.1.6. Collect final external ECAMP reports and determine Air Force trends.
- 1.3.2.1.7. Provide trend analysis of findings to USAF/ILEV and MAJCOMS.
- 1.3.2.1.8. Assist MAJCOMs in identifying and implementing corrective action for training-related findings.

1.3.2.2. Air Force Regional Environmental Office:

- 1.3.2.2.1. Serve as the regional point of contact for liaison activities with state and Federal agencies.
- 1.3.2.2.2. Assist MAJCOMs and installations in reviewing assessment findings and reports, when requested.
- 1.3.2.2.3. Assist MAJCOMs with conducting external ECAMP assessments, when requested.
- 1.3.2.2.4. Develop Enforcement Vulnerability Analysis (EVA) for the MAJCOMs annually.
- 1.3.2.2.5. Conduct regional analysis of final external ECAMP analysis data.
- 1.3.2.2.6. Provide draft TEAM Guide State Supplements to state environmental agencies for review.

1.3.2.3. Air Force Legal Services Agency/Environmental Law and Litigation Division (AFLSA/JACE):

- 1.3.2.3.1. Emphasize which protocols require the most attention to protect Air Force legal interests.
- 1.3.2.3.2. Assist MAJCOMs in determining the appropriateness of disclosing an ECAMP finding to a regulatory agency or including a regulatory agency in the process of environmental self-assessment.
- 1.3.2.3.3. Coordinate on requests seeking protection under Federal, state, or local law or policy related to ECAMP findings.
- 1.3.2.3.4. Assist MAJCOMs on external ECAMP assessments, when requested.

1.3.2.4. Air Force Medical Operations Agency (HQ AFMOA/SGOE)

- 1.3.2.4.1. Attend the annual ECAMP workshop hosted by AFCEE.
- 1.3.2.4.2. Ensure the ECAMP protocols for which the Medical Service is the OPR are current and correct.
- 1.3.2.4.3. Review Air Force Enforcement Vulnerable Analysis (EVA) annually.
- 1.3.2.4.4. Ensure Command Bioenvironmental Engineers are involved with the ECAMP process.

1.3.3. MAJCOMs:

- 1.3.3.1. Ensure implementation of ECAMP.
- 1.3.3.2. Provide annual status reports of ECAMP to HQ USAF/ILEV.
- 1.3.3.3. Provide final external ECAMP report to HQ AFCEE/EQ upon completion.
- 1.3.3.4. Determine scope of an installation's internal assessment based on performance and vulnerability to regulatory agencies.
- 1.3.3.5. Establish criteria for the scope of external assessments.
- 1.3.3.6. Obtain cross-functional participation on the external ECAMP team.
- 1.3.3.7. Benchmark with other DoD or applicable industrial activities for self improvement.
- 1.3.3.8. Approve, with legal review, disclosure of individual findings or the entire Final Compliance Assessment Report (internal and external) to federal, state, or local regulatory authorities.
- 1.3.3.9. Forward information on recurring technical and operational problems to HQ AFCESA/CES to develop solutions and integrate them into Air Force design and operational guidance.
- 1.3.3.10. Finalize external ECAMP reports within 180 days of the assessment outbrief.
- 1.3.3.11. Provide best practice crossfeed to HQ AFCEE/EQ.
- 1.3.3.12. Overseas ECAMP.** Assessments conducted at installations outside the United States and its possessions will be modified as necessary to account for the country-specific Final Governing Standards, or in their absence, the environmental criteria of the DoD Overseas Environmental Baseline Guidance Document (OEBGD). This instruction authorizes MAJCOMs with

installations outside the US and its possessions to modify or adapt definitions in this document to enhance its applicability overseas.

1.3.4. Installations.

1.3.4.1. Installation Commanders ensure Environmental Protection Committees (EPCs) are an integral part of the ECAMP process.

1.3.4.2. Installation Commanders monitor and direct ECAMP implementation.

1.3.4.3. Installation Commanders obtain cross-functional participation on the internal ECAMP team.

1.3.4.4. EPCs finalize the preliminary root cause analysis, track management action plans on each finding, and identify funding to close findings. Additionally, EPCs finalize internal ECAMPs and forward the results to their MAJCOM within 120 days of the assessment outbrief.

Chapter 2

THE ECAMP PROCESS

2.1. The ECAMP Process. ECAMP, a component of the Air Force EMS, is a systematic and continuous improvement process consisting of an Environmental Compliance Assessment and a separate Environmental Management Self-Assessment. Compliance assessments, both internal and external, are comprised of three phases of activities: Pre-Assessment Activities, Site Assessment Activities, and Post-Assessment Activities. MAJCOMs coordinate and conduct external assessments, while installations coordinate and conduct internal assessments. The Environmental Management Self-Assessment is a separate internal assessment activity.

2.2. Pre-Assessment Activities. Clearly state the assessment objectives to facilitate assessment planning. The assessment team pre-assessment activities include a review of all relevant Federal, state, and local regulations; applicable DoD and Air Force instructions and directives for the installation, support site, or GOCO facility being assessed; and past ECAMP reports compiled since the last external ECAMP Assessment. For external assessments, use a Pre-Visit Questionnaire to collect information to familiarize the external assessment team with the composition and operations of the installation. Certain types of facilities, operations, or areas that are not specifically regulated, but are cause for environmental concern, must receive adequate attention during the assessment. MAJCOMs should request AFCEE Regional Environmental Office (REO) Enforcement Vulnerability Analysis (EVA) at least 3 months prior to external ECAMPs from the appropriate regional office. Team members shall review the EVA prior to the assessment.

2.2.1. Assessment Team. Establish the assessment team size and composition based on the size, mission, and number of personnel assigned to the installation being evaluated. ECAMP teams may be composed of Air Force, or a mix of Air Force and contractor personnel, but all assessment teams must have an Air Force team chief. Assessors must be objective and ensure that personal relations do not impair their decision making. They must be afforded the opportunity to exercise free inquiry and judgment, and should not fear retribution. Assessors should possess a good working knowledge of the controlling statutes and regulations as well as a good working knowledge of the operations being assessed. Collectively, the team must have the knowledge and background required to efficiently and effectively conduct all aspects of an installation assessment. Team members should also understand appropriate techniques for collecting information and interviewing installation personnel.

2.3. Site Assessment Activities. The assessment team chief must provide an in-brief to the installation commander at the start of the ECAMP visit. During the site assessment, the assessment team conducts record searches, interviews, and site surveys to determine the compliance status of the installation. The team compares applicable standards to site operations and writes up any deficiencies as findings. The data collected must be sufficient, reliable, and relevant in order to provide a sound basis for assessing the observations and recommendations. The team records findings and comments daily to provide the information required to write the Preliminary Findings. During the assessment, the team provides regular feedback to the installation environmental manager, and other compliance program managers as appropriate, on the evaluated activities so that as many findings as possible may be corrected immediately. The team prepares preliminary root cause analysis and management action plans for each finding.

2.4. Post-Assessment Activities. MAJCOMs will use reports to follow-up site assessment activities by tracking progress on management action plans, and resolving systemic problems identified by root cause analysis.

2.4.1. Correction of Findings. During the ECAMP assessment, relay deficiencies immediately to appropriate management personnel to allow corrective actions to begin. Correct those which are easy to fix on the spot or before the completion of the assessment. Note all observations in the assessment findings, even if they are immediately corrected. Identify in the report any required construction projects, training or other funding needs so that they receive programming for execution through the A-106 process. Ensure root cause analysis is addressed to correct underlying systemic problems.

2.4.2. Preliminary Findings. The ECAMP Team chief out-briefs the installation commander on assessment results, which are based on the Preliminary Environmental Findings.

2.4.3. Pollution Prevention Opportunities. Pollution prevention should always be preferred as a method of closing findings. The assessment team should make initial recommendations for pollution prevention solutions to findings.

2.4.4. Best Practices. Following the internal site assessment, the Installation Commander forwards positive findings considered to be best practices to the MAJCOM for crossfeed consideration and also for inclusion in the semi-annual report to Deputy Undersecretary of Defense (Environmental Security) (DUSD (ES)). MAJCOMs forward the information to AFCEE/EQ for crossfeed to Air Force and other DoD components.

2.5. Environmental Management Self-Assessment. To promote continuous improvement of the Air Force EMS, the MAJCOM may require periodic management self-assessments. The management assessment is intended as a self-improvement tool for individuals at all levels of environmental responsibility. Issues identified that cannot be satisfied at the self-assessor level must be elevated through the chain-of-command for resolution.

Chapter 3

ECAMP ADMINISTRATION PROCEDURES

3.1. Assessment Report Content and Format. Final assessment reports must follow the format described in attachment 2. Management action plans and final reports should be completed and on file at the installation within 180 days of an external assessment and 120 days of an internal assessment.

3.2. Environmental Data Management. The ECAMP core data (**Attachment 5**) will be managed in a database that is selected by the MAJCOM. Each ECAMP final report will be submitted to HQ AFCEE/EQ within 30 days of completion.

3.3. Information Reports Requirements. The reporting requirement for ECAMP findings and action plans is RCS: HAF/ILE[AR]9412, *ECAMP Report* (Reference AFI 32-7002, *Environmental Information Management System*). The Air Force has designated this report as emergency status code D, discontinue reporting during emergency conditions. Minimize is not applicable.

3.4. Policy on Public Release. The Final Compliance Assessment Report once approved by MAJCOM, is releasable under the Freedom of Information Act (FOIA). Requests for other ECAMP documentation should be considered and released only in accordance with AFI 37-131, *Air Force Freedom of Information Act Program* (formerly AFR 4-30). Other ECAMP documentation must be labeled "Pre-decisional Document" or "Draft Document", clearly indicating it is exempt from disclosure under FOIA, 5 USC Sec 552 (b)(5). Installation environmental managers must coordinate with the MAJCOM environmental office before disclosing any non-compliance detected during an ECAMP to a regulatory agency. Legal reviews will be conducted prior to: releasing the Final Compliance Assessment Report; releasing other documentation; or disclosing findings.

3.5. Records Management. AFMAN 37-139, *Records Disposition--Standards* (formerly AFR 12-50, volume 2), contains the disposition standards for all records and reports created under this instruction.

WILLIAM P. HALLIN, Lt General, USAF
DCS/Installations and Logistics

Attachment 1**GLOSSARY OF REFERENCES AND SUPPORTING INFORMATION*****References***

Executive Order 12088, *Federal Compliance and Pollution Control Standards*, October 13, 1978

AFPD 32-70, *Environmental Quality*

DoDI 4715.3, *Environmental Conservation*

DoDI 4715.6, *Environmental Compliance*

Abbreviations and Acronyms

AFCEE—Air Force Center for Environmental Excellence

AFI—Air Force Instruction

AFPD—Air Force Policy Directive

AFR—Air Force Regulation

ANG—Air National Guard

ANGRC—Air National Guard Readiness Center

DoD—Department of Defense

ECAMP—Environmental Compliance Assessment and Management Program

EMS—Environmental Management System

EMSAT—Environmental Management Self Assessment Tool

EPC—Environmental Protection Committee

ESOH—Environment, Safety, and Occupational Health

EVA—Enforcement Vulnerability Analysis

GOCO—Government Owned Contractor Operated

MAJCOM—Major Command

OPR—Office of Primary Responsibility

TEAM—The Environmental Assessment Manual

TSDF—Treatment, Storage, and Disposal (TSD) Facility

Terms

A-106 Report—Required for all Air Force installations for programming and budgeting.

Benchmark—. The comparison of one organization against others, particularly those that are considered to be operating at the highest level or comparison to established management standards.

Best Practices—A standard of excellence or achievement considered best-in-class. It serves as a reference point for setting internal targets or goals and improving your process(es).

Carryover Finding—A finding that has been observed and documented in a previous ECAMP and has remained open.

Compliance Assessment Protocols—The specific environmental compliance guidelines and compliance checklist for each of the thirteen compliance areas. These compliance areas include: Air Emissions Management; Cultural Resources Management; Hazardous Materials Management; Hazardous Waste Management; Natural Resources Management; Other Environmental Issues; Pesticides Management; Petroleum, Oils and Lubricants Management; Solid Waste Management; Storage Tank Management; Toxic Substances Management; Wastewater Management; and Water Quality Management.

ECAMP Analysis Data—This data is a sub-set of the external ECAMP Core Data. ECAMP analysis data consists of the following fields: State, Country, rating, repeat finding, media by law (if applicable), citation, finding ID code, and root cause.

ECAMP Core Data—The minimum non-compliance data to be collected in internal and external assessments. Field names, type and size are specified in Attachment 5.

Enforcement Vulnerability Analysis (EVA)—A document prepared by AFCEE Regional Environmental Offices (REOs) for the MAJCOMs which assist the external ECAMP team in addressing issues and ECAMP findings which are susceptible to enforcement by regulatory agencies.

Environmental Compliance Assessment—A systematic, documented, periodic and objective assessment of installation operations and practices subject to environmental requirements. (Environmental compliance assessments are not within the scope of the auditing provisions of DoD Directive 7600.2, *Audit Policies*, February 2, 1991).

Environmental Management Self-Assessment—A systematic process to help managers identify the issues that are necessary to improve their environmental management program. Management self assessments extend from the wing commander to shop level personnel.

Environmental Protection Committee (EPC)—Environmental organization within the Air Force whose main purpose is to ensure consideration of environmental concerns in every phase of Air Force activity.

Environment, Safety, and Occupational Health (ESOH)—ESOH includes environmental, safety, and occupational health issues.

External Assessment—An assessment conducted by personnel not directly associated with the evaluated activities. The MAJCOM will be responsible for making necessary arrangements for the external assessment.

Final Environmental Compliance Assessment Report—The corrected, reviewed and approved Environmental Compliance Assessment Report.

Final Governing Standard (FGS) or Overseas Environmental Baseline Guidance Document (OEBGD) Criteria—A finding based on an FGS/OEBGD criteria at overseas locations must be reported in the ECAMP report. If an FGS is not available for a given country, findings will be based upon the OEBGD. All findings with FGS or OEBGD criteria will be placed in chapter 3 of the assessment report, or in a separate chapter if deemed appropriate by the MAJCOM.

Installation—A grouping of facilities, located in the same vicinity, which support particular functions. Installations may be elements of a base. See also base; base complex (JP 1-02) Installations may be further defined as:

Major Installation—In the Air Force, a self-supporting center of operations for actions of importance to Air Force combat, combat support, or training. It is operated by an active, Reserve, or Guard unit of group size or larger with all land, facilities and organizational support needed to accomplish the unit mission. It must have real property accountability through ownership, lease, permit, or other written agreement for all real estate and facilities. Agreements with foreign governments which give the Air Force jurisdiction over real property meet this requirement. Shared use agreements (as opposed to joint use agreements where the Air Force owns the runway) do not meet the criteria for a major installation. This category includes Air Force bases, air bases, Air Reserve bases, and Air Guard bases.

Minor Installation—In the Air Force, a facility operated by an active, Reserve, or Guard unit of at least squadron size that does not otherwise satisfy all the criteria for a major installation. This category includes Air Force stations, air stations, Air Reserve stations, and Air Guard stations. Examples of minor installations are active, Reserve and Guard flying operations that are located at civilian-owned airports. (Joint Pub 1-02).

Installation Complex—In the Air Force, a combination of land and facilities comprised of a main installation and its noncontiguous properties (ranges, auxiliary air fields, annexes and/or missile fields) which provide direct support to or are supported by that installation. Installation complexes may comprise two or more properties, e.g., a major installation, a minor installation, or a support site, each with its associated annex(es) or support property(ies). See also major installation, minor installation, support site. (Joint Pub 1-02).

Installation Restoration Program (IRP)—DoD's program to identify, investigate, and clean up past disposal sites.

Internal Assessment—An environmental compliance assessment conducted by installation personnel.

MAJCOM—As used in this document refers to major commands and separate operating agencies.

Major Finding—Any finding that is out of compliance with Federal, state, or local law. Major findings require future action to avoid potential threats to human health, safety, the environment, or the installation mission.

Management Practices—Recommendations included for reducing environmental risks and improving environmental management. These recommendations are not based on environmental regulations and do not involve noncompliance. Instead, they are management practices that, if followed, will help keep an installation in or ahead of compliance.

Minor Finding—Any finding that is out of compliance with DoD or AF Instructions at any level. Minor findings are generally administrative and procedural in nature.

Other Activity—In the Air Force, a unit or activity that has little or no real property accountability over the real estate it occupies. Examples include active or Reserve Air Force units that are located on installations belonging to other Services or leased office space that supports recruiting detachments, Civil Air Patrol, etc. (Joint Pub 1-02).

Polychlorinated biphenyls (PCB)—Toxic, halogenated organic compounds which are not easily degraded and are persistent in the environment. They were formerly used (and are still found) in electrical devices, such as transformers and capacitors, hydraulic systems, and other applications.

Positive Findings—Positive findings are an observed condition, or management action in which an organization or individual has met and exceeded the compliance requirements; sought innovative and

creative management techniques to achieve compliance; or improved operations to minimize environmental impact.

Preliminary Environmental Findings—The findings the assessment team documents in their initial report.

Pre-Visit Questionnaire—The purpose of the pre-visit questionnaire is to collect information which will help determine the composition of the external assessment team and then familiarize the team with the installation and its operations prior to the team's arrival.

Repeat Finding—A finding identified and documented during a previous ECAMP that had been closed, but the same condition has reoccurred.

Significant Finding—A problem categorized as significant requires immediate action. It poses, or has a high likelihood of posing, a direct and immediate threat to human health, safety, the environment, or the installation mission.

Support Site—In the Air Force, a facility operated by active, Reserve, or Guard unit that provides general support to the Air Force mission and does not satisfy the criteria for a major or minor installation. Examples of support sites are missile tracking sites, radar bomb scoring sites, Air Force-owned , contractor-operated plants, radio relay sites, etc. (Joint Pub 1-02).

United States and Possessions—The 50 states, the District of Columbia, the Commonwealth of Puerto Rico, the Panama Canal Zone, Guam, American Samoa, the U.S. Virgin Islands, the Trust Territory of the Pacific Islands, and the Commonwealth of the Northern Mariana Islands.

Attachment 2

ENVIRONMENTAL COMPLIANCE ASSESSMENT REPORT FORMAT

Chapter 1. Executive Summary

The executive summary contains background information and a summary of findings.

1.1. Background:

The background contains the minimum essential information, such as date and location of the assessment, identification of the assessment team, and overall assessment purpose. This section rarely exceeds one page and is needed by a reader who has not been involved with the assessment

1.2. Summary of Findings:

This section includes positive and negative comments, major environmental issues, a summary of compliance status by protocol, and Environmental Compliance Summary Table.

Chapter 2. Background and Scope

This section is reserved for information that does not fit into the executive summary or the compliance findings section, but is necessary to make a complete report.

2.1. Background:

ECAMP Objectives--Present the ECAMP objectives as stated in this regulation, and individual objectives unique to each specific assessment.

Installation Description--Describe the major attributes of the installation.

Environmental Management System--Describe in general terms how the installation's environmental management system is structured.

2.2. Scope:

Activity Review--Describe the base activities that were assessed (this is the appropriate section for positive findings). Comment on the state and local, or host nation regulations that were considered, or used, during the assessment.

Summary of Assessment Procedures--A statement that the assessment included a review of documentation, inspection of facilities, and interviews of personnel.

Chapter 3. Environmental Compliance Status

This chapter contains both positive and negative finding details identified during the assessment. Negative findings that remain open from the last external ECAMP must be identified as carryover findings. Negative findings that were closed since the last ECAMP and have occurred again must be identified as repeat findings. Ensure that each finding is defined clearly and concisely describes the specific condition or action in a factual manner and is free of the evaluator's opinions. Each negative open finding will have a corresponding management action plan. Finding

details are organized in this chapter in accordance with the Air Force and MAJCOM supplements to the TEAM guide to include protocols, report tables, etc.

Attachment 3

FINDING CODES

A3.1. Each noncompliance finding must be assigned the applicable finding identification codes (FIC) listed in the Air Force or MAJCOM supplements to the TEAM Guide. The purpose of the codes is to improve and simplify tracking, identify Air Force-wide environmental problems and to improve program management.

A3.2. Finding Identification Codes. FICs are used to indicate the specific environmental media involved in each finding.

ACTUAL CODE	FINDING ID CODE
Air Emissions	
AE1	Emissions Limits Or Operational Requirements Not Met
AE2	Construction Permits Missing
AE3	Permit Conditions Not Met
AE4	Sources Not Permitted
AE5	Operating Permit Incomplete
AE6	Emission Inventory Inaccurate
AE7	ODC Management Deficiency
AE8	Gasoline/Fuels Management
AE9	Vehicle Emissions Testing
AE10	Solvent Degreaser Deficiencies
AE11	Other (please indicate on the finding sheet the nature of the finding)
Cultural Resources Management	
CR1	Inadequate Historic Properties Management
CR2	Inadequate Religious/Heritage Access
CR3	Inadequate Archaeological/Native American Site Management
CR4	Inadequate Collection Management and Curation
CR5	Inadequate/Lacking Survey/Plans
CR6	Other (please indicate on the finding sheet the nature of the finding)
Hazardous Materials Management	
HM1	Inadequate Storage Cabinet
HM2	Inadequate Storage Room
HM3	Storage Building Deficiency
HM4	Inadequate Outside Storage

ACTUAL CODE	FINDING ID CODE
HM5	Improper Storage Practice
HM6	Compressed-Gas Storage Deficiency
HM7	Bulk-Acid Storage Deficiency
HM8	Fire Protection Deficiency
HM9	Personnel Protective Equipment Deficiency
HM10	Inadequate HAZCOM Program
HM11	Improper/Lacking Reporting (EPCRA/Release)
HM12	Inadequate Emergency Response Planning
HM13	Laboratory Management Deficiency
HM14	Transportation Deficiency
HM15	Other (please indicate on the finding sheet the nature of the finding)
Installation Restoration Program (IRP)	
IR1	Inadequate/Lacking Restoration Advisory Board
IR2	Record Keeping Deficiency
IR3	Inadequate/Lacking Administrative Record
IR4	Community Relations Plan Deficiency
IR5	Improper IRP Site Management
IR6	Other (please indicate on the finding sheet the nature of the finding)
Natural Resources Management	
NR1	Inadequate/Lacking Integrated Natural Resource Management Plan
NR2	Ecosystem Management Deficiency
NR3	Land Management Deficiency
NR4	Range Management Deficiency
NR5	Forestry/Silviculture Management Deficiency
NR6	Agriculture/Grazing Management Deficiency
NR7	Wetlands Deficiency
NR8	Flora and Fauna Management Deficiency
NR9	Threatened and Endangered Species Management Deficiency
NR10	Other (please indicate on the finding sheet the nature of the finding)
Other Environmental Issues:	
National Environmental Policy Act	
EO1	Lack of NEPA In Project Planning
EO2	Inadequate Documentation/Record Keeping
EO3	NEPA Other (please indicate on the finding sheet the nature of the finding)

ACTUAL CODE	FINDING ID CODE
Hazardous Waste Management	
HW1	Satellite Accumulation Point Deficiency
HW2	90-day (180-Day for Small Quantity Generators) Accumulation Point
HW3	TSD Facility Deficiency
HW4	Lack of Characterization
HW5	Transportation/Manifest Deficiency (except LDR)
HW6	Unpermitted/Improper Disposal
HW7	Unpermitted/Treatment
HW8	Inadequate Waste Minimization
HW9	Program Planning Deficiency
HW10	Waste Analysis Characterization Planning Deficiency
HW11	Facility-Wide Records Deficiency
HW12	AFI/Procedural Records Deficiency
HW13	Training Deficiency
HW14	Land Disposal Restriction (LDR) Deficiency
HW15	Other (please indicate on the finding sheet the nature of the finding)
Environmental Noise	
EO4	Inadequate/Lacking AICUZ
EO5	Inadequate Management of Noise Complaints
EO6	Range Noise Management Deficiency
EO7	Noise Other (please indicate on the finding sheet the nature of the finding)
Program Management	
EO8	Improper Management of Ranges
EO9	Inadequate A-106 Pollution Abatement Plan
EO10	Environmental Baseline Study Deficiency
EO11	Compliance Tracking/Reporting Deficiency
EO12	Environmental Protection Committee Deficiency
EO13	Inadequate WIMS-ES Management
EO14	Program Management Other (please indicate on the finding sheet the nature of the finding)
Pesticides Management	
PM1	DoD Applicator Certification Deficiency
PM2	Inadequate/Lacking Integrated Pest Management Plan
PM3	Inadequate/Lacking Application Records
PM4	Inadequate Storage Structures

ACTUAL CODE	FINDING ID CODE
PM5	Improper Storage Practices
PM6	Inadequate/Lacking Pesticide Inventory
PM7	Contractor Application Deficiency
PM8	Unapproved Pesticide Use
PM9	Application Equipment Deficiency
PM10	Inadequate Residue/Container Disposal
PM11	Other (please indicate on the finding sheet the nature of the finding)
POL Management	
PO1	Spill Plan Deficiency
PO2	Inadequate Spill Training
PO3	Spill Cleanup Deficiency
PO4	Inadequate Spill Equipment
PO5	Service Stations Deficiency
PO6	Marine Oil Transfer Deficiency
PO7	Inadequate Loading Areas
PO8	Inadequate Pipelines
PO9	Inadequate Used Oil Management
PO10	Other (please indicate on the finding sheet the nature of the finding)
Pollution Prevention	
PP1	Inadequate/Lacking Opportunity Assessment/Pollution Prevention Planning
PP2	Inadequate Recycling Program
PP3	Inadequate/Lacking Waste Minimization
PP4	Inadequate Hazardous Substance Control and Reduction
PP5	Improper Management of ODCs
PP6	Inadequate Energy Conservation
PP7	Inadequate/Lacking Affirmative Procurement
PP8	Other (please indicate on the finding sheet the nature of the finding)
Solid Waste Management	
SW1	Improper/Unpermitted Disposal
SW2	Landfill Management Deficiency
SW3	Resource Recovery Facility Deficiency
SW4	Improper/Unpermitted Storage
SW5	Dumpster/Receptacle Deficiency
SW6	Special Waste Materials Deficiency

ACTUAL CODE	FINDING ID CODE
SW7	Medical Waste Deficiency
SW8	Overseas Waste Deficiency
SW9	Inadequate/Lacking Disposal Records
SW10	Other (please indicate on the finding sheet the nature of the finding)
Storage Tank Management	
ST1	AF Tank Management
ST2	AST Installation Deficiency
ST3	AST Containment Deficiency
ST4	AST Spill Reporting/Cleanup Deficiency
ST5	UST Installation Deficiency
ST6	UST Notification Deficiency
ST7	UST Leak Testing Deficiency
ST8	UST Removal Deficiency
ST9	UST Spill/Leak Reporting/Cleanup Deficiency
ST10	Other (please indicate on the finding sheet the nature of the finding)
Toxic Substances Management:	
PCBs	
TS1	Labeling Deficiency
TS2	Inadequate/Lacking Inventory
TS3	Storage Deficiency
TS4	PCB Inspection Deficiency
TS5	PCB Spill/Leaking Equipment
TS6	Documentation Deficiency
TS7	Exceeding 1 Yr Storage Time
TS8	Equipment Management Deficiency
TS9	PCB Other (please indicate on the finding sheet the nature of the finding)
Asbestos	
TS10	Labeling Deficiency
TS11	Inadequate Container Management
TS12	Inadequate Personnel Certification/Training
TS13	Abatement Site Management Deficiency
TS14	Inadequate/Lacking Survey/Plans
TS15	Disposal Deficiency
TS16	Improper Management of ACM

ACTUAL CODE	FINDING ID CODE
TS17	Asbestos Other (please indicate on the finding sheet the nature of the finding)
Radon Mitigation	
TS18	Inadequate/Lacking Sampling
TS19	Inadequate/Lacking Documentation
TS20	Improper Notification
TS21	Radon Other (please indicate on the finding sheet the nature of the finding)
Lead-Based Paint (LBP) Management	
TS22	Inadequate/Lacking Survey/Required Investigation
TS23	Improper Sampling
TS24	Inadequate/Lacking Documentation
TS25	Improper Notification
TS26	LBP Training Deficiency
TS27	LBP Other (please indicate on the finding sheet the nature of the finding)
Wastewater Management	
WW1	Unpermitted Discharge
WW2	Noncompliance with Discharge Permit
WW3	Monitoring/Sampling Deficiency
WW4	Discharge Monitoring Record Keeping Deficiency
WW5	Oil/Water Separator Deficiency
WW6	Collection System (e.g., lift stations, sewer lines, etc.) Deficiency
WW7	Improper Wastewater Treatment Plant Operation
WW8	Improper Sewage Sludge Disposal
WW9	Inadequate Treatment Plant Operator Training/Certification
WW10	Underground Injection Well (e.g., septic tanks) Management Deficiency
WW11	Fire Training Pit Deficiency
WW12	Storm Water Management Deficiency
WW13	Nonpoint Source Management Deficiency
WW14	Other (please indicate on the finding sheet the nature of the finding)
Water Quality Management	
WQ1	Unpermitted Water Supply System
WQ2	Noncompliance With Withdrawal Permit
WQ3	Inadequate Water Source Protection
WQ4	Exceeding Water Quality Standard
WQ5	Monitoring/Sampling Deficiency

ACTUAL CODE	FINDING ID CODE
WQ6	Notification/Record Keeping Deficiency
WQ7	Water Tank/Reservoir Deficiency
WQ8	Filtration/Chlorination Facility Deficiency
WQ9	Distribution System Deficiency
WQ10	Backflow Prevention Deficiency
WQ11	Water Plan Operator Training/Certification Deficiency
WQ12	Water Quality Monitoring Record Keeping Deficiency
WQ13	Other (please indicate on the finding sheet the nature of the finding)

Attachment 4**ROOT CAUSE CODES**

The purpose of the codes is to understand the underlying cause for deficiencies or incidents and make it easier to identify solutions to prevent recurrence. The codes listed below represent the tier structure and top-tier categories. Root Cause Codes are further defined in the Air Force and MAJCOM supplements to the TEAM Guide.

	Plans and Implementation
PA	ECAMP
PA1	Assessments of inspections are not conducted by trained and qualified professionals
PA2	Inadequate or conflicting guidance exists for conducting assessments or inspections
PA3	Appropriate review and follow-up of self-assessment and/or inspection program are not conducted.
PE	Emergency Plans
PE1	Emergency plans and/or procedures are not established.
PE2	Emergency plans and/or procedures are inadequate.
PE3	System is not in place to properly coordinate the review and acceptance of new and / or updated plans and/or procedures.
PE4	Emergency plans and/or procedures are not effective and/or properly implemented.
PM	Management Action Plans (MAPs)
PM1	MAPs are not established.
PM2	MAPs are inadequate.
PM3	System is not in place to properly coordinate the review and acceptance of new and / or updated MAPs.
PM4	MAPs are not effective and/or properly implemented.
PP	Environmental Management Plans
PP1	Environmental management plans and/or procedures are not established.
PP2	Environmental management plans and/or procedures are inadequate.
PP3	System is not in place to properly coordinate the review and acceptance of new and / or updated plans and/or procedures.
PP4	Plans and/or procedures are not effective and/or properly implemented.
PD	Documentation/Regulations Tracking/Recordkeeping
PD1	System not in place to track new or changing regulations.

	Plans and Implementation
PD2	New regulatory requirements are not being incorporated into standard operating procedures.
PD3	Regulations are misinterpreted or unknown.
PD4	Document control system and record retention policy does not exist or is inadequate.
PC	Compliance Tracking and Reporting
PC1	Tracking system for key regulatory compliance deadlines does not exist or is inadequate.
PC2	No formal mechanisms exist to investigate, report, correct, track, or monitor environmental problems and incidents.
	Training and General Awareness
TC	Continuing Education
TC1	Personnel not trained
TC2	Personnel trained but course content inadequate
TC3	Insufficient skills to execute procedures properly (individual has received the proper training but is not proficient in skills)
TM	Mandated
TM1	Personnel not trained
TM2	Personnel trained but course content inadequate
TM3	Personnel trained but did not fully understand requirement
TM4	Training not properly documented
TG	General Awareness
TG1	Personnel not trained
TG2	Personnel trained but course content inadequate
TG3	Personnel trained but did not fully understand requirement
	Command Emphasis/Oversight
CO	Management Organization and Oversight Implementation
CO1	Known deficient item, facility, or equipment, not formally identified for action/funding (not acting on a known deficiency)
CO2	Higher priority mission requirements took precedence
CO3	Insufficient skills to execute procedures properly (individual has received the proper training but is not proficient in skills)

	Plans and Implementation
CO4	Procedures have been developed and implemented but are not being followed
CO5	Inadequate manning
CO6	Environmental management does not participate at key strategic and operations planning meetings
CO7	Line manager(s) does not show commitment and/or responsibility for minimizing environmental impacts within operations area.
CO8	Environmental responsibilities are not clearly defined and understood by personnel.
CM	Contract Management
CM1	Contract documents are inadequate (e.g. specifications, statements of work do not hold contractor accountable for noncompliance with environmental requirements).
CM2	Contract documents are adequate but contractor does not fulfill requirements.
CR	Roles and Responsibilities
CR1	Personnel understood requirement, but simply forgot to act.
CR2	Environmental responsibilities are not clearly defined in job descriptions.
CR3	Environmental responsibilities are not included in performance standards.
CR4	Environmental responsibilities are not clearly defined and understood by personnel.
CR5	Procedures have been developed and implemented but are not being followed.
CP	Policy Statement and Implementation
CP1	Formal policies are not issued from an appropriate level of authority.
CP2	Existing policies conflict with environmental protection initiatives.
CP3	Formal statements of environmental goals and objectives are lacking.
CP4	Environmental requirements are not adequately considered when developing policies.
CP5	Environmental considerations are not adequately integrated into accomplishment of military missions.
CC	Communication
CC1	Working relationships are ineffective within the organization.
CC2	Personnel concerns are not solicited, addressed, or documented.
CC3	The organization does not have a good working relationship with tenant agencies.
CC4	The organization does not have a good working relationship with external agencies.
CI	Procedures Implementation

	Plans and Implementation
CI1	Procedures have not been developed.
CI2	Procedures have been developed but are inadequate.
CI3	Procedures have been developed but are not effectively implemented.
	Resources
RI	Infrastructure/Facilities and Equipment
RI1	Inadequate facility design
RI2	Equipment failure
RP	PPBS Process
RP1	Deficient item, or equipment properly identified, but not funded
RP2	Deficient manpower properly identified, but not funded.
RS	Supplies and Contracts (documentation)
RS1	Supplies have been ordered but have not been received.
RS2	Contract deliverables are not properly identified and/or delivered.
RS3	Time delay due to complex acquisition process.
	External Factors
EU	Unforeseen Accident
EW	Weather Related
EA	Animal Activity
EV	Acts of Vandalism
EG	Acts of God

Attachment 5

ECAMP CORE DATA

ECAMP Core Data. In order to facilitate Air Force wide data collection and assessment each compliance assessment will include the collection of the following information in the format specified below. ECAMP Analysis Data in Bold print is the subset of data that will be submitted to AFCEE from external assessments.

REQUIRED FIELD NAME	REQUIRED FIELD TYPE	REQUIRED FIELD LENGTH
MAJCOM	TEXT	50
BASE	TEXT	50
COUNTRY	TEXT	50
STATE	TEXT	50
FINDING DATE	MEDIUM DATE	11
PROTOCOL	TEXT	50
FINDING NUMBER	TEXT	50
QUESTION NUMBER	TEXT	50
SOURCE	TEXT	50
RATING	TEXT	50
REPEAT FINDING?	YES/NO	1
CARRYOVER FINDING	YES/NO	1
PREVIOUS FINDING NUMBER	TEXT	50
BLDG NUMBER	TEXT	50
LOCATION	TEXT	100
FINDING TITLE	TEXT	100
FINDING DETAIL	MEMO	unlimited
CITATION	TEXT	140
OTHER CRITERIA	TEXT	140
MEDIA BY LAW CODE	TEXT	50
FINDING ID CODE	TEXT	50
RESPONSIBLE ORG	TEXT	60
RESPONSIBLE ORG POC	TEXT	50
POC PHONE NUM	TEXT	50
SUGGESTED ACTION	MEMO	unlimited
CORRECTIVE ACTION	MEMO	unlimited
CORRECTIVE ACTION COST	CURRENCY	8

REQUIRED FIELD NAME	REQUIRED FIELD TYPE	REQUIRED FIELD LENGTH
A-106 PROJECT NUMBER	TEXT	50
STATUS	MEMO	unlimited
ESTIMATION COMPLETION DATE	MEDIUM DATE	11
ACTUAL COMPLETION DATE	MEDIUM DATE	11
ROOT CAUSE CODE	TEXT	50
LAST UPDATE	MEDIUM DATE	11